



**Housing Trust Fund: Homeless Reduction Grant
Program Guidelines
2016-2017**



Purpose

The Virginia Housing Trust Fund Homeless Reduction Grant program goal is to reduce homelessness in the Commonwealth of Virginia. DHCD will support continuum of care (CoC)/balance of state local planning group (LPG) strategies and homeless service projects that are a part of an effective emergency crisis response system in communities to ensure that homelessness is rare, brief, and non-recurring.

The Homeless Reduction Grant program must be coordinated with other community-based activities. All CoCs, LPGs, and DHCD homeless services grantees use a local centralized or coordinated assessment/entry system. A local centralized or coordinated assessment/entry system is the best practice for a housing-focused approach targeted to helping households experiencing homelessness quickly regain stability in permanent housing.

This funding supports rapid re-housing, permanent supportive housing, and predevelopment activities that are targeted and coordinated with other service providers and mainstream community resources.

Background

The Homeless Reduction Grants are funded through Virginia's Housing Trust Fund, a state appropriation of \$5,500,000 per annum for the 2017-2018 biennium budget. At least 80 percent of the Housing Trust Fund is to be used for short, medium and long-term loans to reduce the cost of homeownership and rental housing. Up to 20 percent of the Housing Trust Fund may be used to provide grants for targeted efforts to reduce homelessness. Priority consideration will be given to efforts to reduce the number of homeless youth and families.

The DHCD anticipates awarding approximately \$850,000 for the Homeless Reduction Grant portion of the Housing Trust Fund in fiscal year 2017. Funding will be awarded to projects best aligned with state and federal goals to end homelessness in communities throughout the commonwealth. Additionally, up to \$250,000 will fund a pilot project focused on housing stabilization for families and coordinated with the Governor's Challenged Schools initiative.

Eligible Grantees

Eligible grantees are units of local government, non-profit organizations, housing developers (non-profit and for-profit), Community Housing Development Organizations (CHDOs), single purpose organization, or limited liability corporations. The preferable grantee is the primary partner in the LLC, development team, or the individual organization that will have the ongoing responsibility for the project. Proposed projects that will leverage multiple partners and subcontracts are allowable.

The grantee is the entity responsible for compliance. DHCD may not enter into program contracts with any grantee with outstanding audit findings, IRS findings, DHCD monitoring findings or other compliance issues. However, DHCD will work with all interested parties toward the resolution of outstanding issues, when appropriate.

Eligible Program Participants

The Homeless Reduction Grant program targets individuals and families who are homeless or those that are chronically homeless. These include households that fall into one of the following categories:

1. Literally homeless: individuals and families who lack a fixed, regular, and adequate nighttime residence including those residing in a shelter or a place not meant for human habitation and those exiting an institution where they resided temporarily; or
2. Chronically homeless: individual and families that have been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last three years; and, have an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of 2 or more of those conditions.

Eligible Projects

Eligible projects are designed to reduce homelessness and are located within Virginia and include:

- Rapid re-housing
- Permanent supportive housing (housing stabilization services)
- Predevelopment (permanent supportive housing for chronically homeless)

Rapid Re-housing

Homeless reduction grants may be used to expand existing programs or support new efforts where a local gap exists. Any new effort must have grant-funded activities underway within 30 days of contract start date. DHCD reserves the right to de-obligate funding where project activities have not met this 30-day deadline.

Eligible rapid re-housing assistance includes rental assistance and/or support services to rapidly re-house individuals and families that are homeless. Individuals and families must meet the HUD definition of literal homelessness by:

- Lacking a fixed, regular, and adequate nighttime residence including those residing in a shelter or a place not meant for human habitation; or
- Exiting an institution where they resided temporarily.

Rapid Re-housing Eligibility

When households initially receive rapid re-housing assistance, they must be literally homeless. The total period for re-housing assistance is limited to 12 months; however, financial assistance beyond three months requires recertification of eligibility. This recertification must then be completed every three months for the duration of financial assistance.

Recertification requires grantee certification and evidence of:

- Program participant household income below 30 percent area median income (AMI);
- The household lacking the financial resources and support networks needed to remain in existing housing without rapid re-housing assistance; and,
- Housing stabilization services being appropriately implemented.

Income eligibility is not required when households first access rapid re-housing because they are literally homeless; however, it is required when recertifying continued eligibility for rapid re-housing assistance. At each three month rapid re-housing recertification, the household must be below 30 percent of AMI with no more than \$500 in assets (including all checking, savings, retirement accounts, stocks, bonds, mutual funds, and real estate). This does not include primary, appropriate, and reasonable transportation, pension or retirement funds that cannot be accessed. Grantees must use [HUD Published Income Limits](#) and must use HUD's Section 8 income eligibility standards for determining program eligibility.

Documentation of homeless status and re-housing assistance eligibility is required. The DHCD *Homeless Certification, Rapid Rehousing Program Participant Eligibility Requirements, and Recertification* documentation must be included in each program participant file with appropriate source documentation. The grantee must use third party verification where possible.

Eligible Costs

Eligible costs included in the rapid re-housing cost category include:

- Rent assistance/rent arrears
- Housing stabilization financial assistance
- Housing stabilization services/case management
- Housing search and placement
- Administrative costs (3 percent limit)

Grantees must not make payments directly to program participants, but only to third parties, such as landlords. In addition, an assisted property may not be owned by the grantee or the parent organization, subsidiary or affiliated organization of the grantee.

Rapid re-housing assistance requires that the program participant head of household have the valid lease in his/her name that is in compliance with tenant/landlord laws. A copy of this lease must be included in the program participant record.

Grantees must have written agreements with both the program participant and the landlord that identify the terms of the rapid re-housing assistance. This should specifically provide the landlord with guidance for addressing issues which could impact housing stability.

All households seeking services must be screened and have an initial assessment completed through a centralized or coordinated process. Housing barrier assessments and housing plans are required for all program participants (see *Initial Screening and Housing Barrier Assessment and Housing Plan*).

Rental Assistance/Rent Arrears

Rental assistance is tenant-based and can be used to allow individuals and families to obtain and remain in rental units. The following guidelines apply:

- No program participant may receive more than 12 months of assistance.
- Grantees must determine the amount of rental assistance provided, such as “shallow subsidies” (payment of a portion of the rent), payment of 100 percent of the rent charged, or graduated/declining subsidies.
- Assistance with any portion of rent during a month counts as a month toward the 12 month limit.
- Payment of rent arrears consists of a one-time payment for up to six months in arrears, including any late fees on those arrears. Rental arrears may be paid if the payment enables the program participant to obtain a housing unit. If funds are used to pay rental arrears, arrears must be included in determining the total period of the program participant’s rental assistance, which may not exceed 12 months. Assistance with rent arrearage must assist the program participant to obtain housing where the program participant would remain homeless.
- While the payment of rent arrears is a lump sum and recorded as such in HMIS, each month and the number of months must be noted in HMIS and counted toward the total rent assistances limit of 12 months.
- Any individual or family receiving assistance beyond any arrears and two current months of rent and utility assistance must be evaluated and recertified as eligible every three months. Recertification of eligibility includes the following:
 - Program participant household income below 30 percent AMI
 - The household lacks the financial resources and support networks needed to remain in existing housing without rapid re-housing assistance
 - Housing stabilization services are being appropriately implemented
- Grantees are required to certify eligibility at intake and at least once every three months.
- Grantees must provide the appropriate level of case management in order to assure housing stability (at least monthly case management is required).
- Grantees may require a program participant *to share in the costs* of rent.
- Assistance should be “*needs-based*,” meaning that grantees should determine the amount of assistance based on the minimum amount needed to help the program participant maintain housing stability *in the near term*. This will also help communities to utilize program resources efficiently to serve as many households as possible.
- Funds may not be used to pay damage costs incurred by the tenant.

- When households are moved into a unit, the rent must meet two standards:
 1. Rent Reasonableness – rent is equal to or less than other like units in the area
 2. Fair Market Rent (FMR) – rent (including utilities) is at or below the HUD established FMR for the unit size in the area
- The rental assistance to move into a new unit cannot exceed the actual rental cost, which must be in compliance with HUD’s standard of “rent reasonableness.” “*Rent reasonableness*” means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. To make this determination, the grantee should consider (a) the location, quality, size, type, and age of the unit; and (b) any amenities, housing services, maintenance and utilities to be provided by the owner. A copy of the [HUD rent reasonableness worksheet](#) must be completed and included in the program participant file.
- The rental assistance to move into a new unit cannot exceed the actual rental cost, which must be at or below [Fair Market Rents \(FMR\) for the area](#). Note: the FMR, including utility allowances, requires grantees to utilize the appropriate utility allowance for any utilities that are paid by the program participant separate from rent. A copy of the completed worksheet must be included in the program participant file.
- FMR limits include the cost of utilities. Grantees will need to utilize an established utility allowance in order to assess FMR limits for rents on units not including all utilities. The grantee may use the local housing authority’s or [VHDA’s](#) appropriate regional allowances in order to calculate the rent standard. The actual rent charged for a unit plus the allowance for any utilities that the program participant must pay themselves must not exceed the FMR for the area.
- No duplication of assistance. Financial assistance cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program.
- Rental assistance or arrears to pay for a lot on which a manufactured or mobile home is located is an eligible expense as long as the household is otherwise eligible.
- Rental assistance provided toward rent for a housing unit owned by a grantee, related entity, or partner is prohibited.

Housing Stabilization Financial Assistance

Funds may be used to provide financial assistance to help program participants quickly access housing. The housing relocation and stabilization services financial assistance includes:

- Security and utility deposits
 - Last month's rent
 - Utility payments
 - Utility arrears
 - Moving costs
 - Application fees
- Grantees are required to certify eligibility at intake and at least once every three months where financial assistance is provided.
 - Funds may be used to pay for security deposits, including utility deposits, for program participants. This is eligible in the case where the program participant is otherwise eligible and they are not receiving security or utility deposits assistance from another source.
 - Grantees must not take measures to recapture any deposit assistance provided to program participants. In the cases where the return of a deposit to the grantee is unavoidable, all returned deposits must be tracked as program income. Any resulting program income must be used for eligible activities.
 - Funds may be used for up to 12 months of utility payments for each program participant in any three year period of time, provided that the program participant or a member of his/her household has an account in his/her name with a utility company and is not receiving utility assistance for the same period of time for the utilities.
 - Utility assistance may include up to six months of utility payments in arrears per service. Payments of arrears must be counted toward the 12 month limit.
 - The grantee may want to consider using the Virginia Housing Development Authority (VHDA) [utility allowance schedules](#) to set reasonable limits for utility payment.
 - Assistance should be "needs-based," meaning that grantees should determine the amount of assistance based on the minimum amount needed to maintain housing stability *in the near term*. This will also help communities to utilize program resources efficiently to serve as many households as possible.
 - Assistance with utilities may be structured where the program participant pays a portion of the utilities. Partial assistance payment for any month of utilities counts as a month of assistance. Grantees may pay past due utilities, however the past due months must be included in the 12 month limit. Utilities are limited to water/sewer, heating oil, gas, and electricity. Twelve month limits are based on assistance with one or more of the basic utilities per month. Since the actual number of months may be difficult to determine, grantees may use estimates to determine the total number of months covered. In these cases the grantee must document the basis for the estimation.
 - Funds may be used for reasonable moving costs, such as truck rental or hiring a moving company, to assist an eligible household with housing stability.

- Funds may be used for lease or apartment application fees where necessary and no other source has been identified to assist an eligible household with housing stability.

Housing Stabilization Services/Case Management

Funds may be used for housing stability services/case management. These are the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for program participants residing in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Clients must receive case management at least once a month; however, services may not be required of program participants.

This assistance cannot exceed 12 months during the period the program participant is living in permanent housing. Note that regardless all program participants must be transitioned as quickly as possible to permanent housing.

These costs include:

- Conducting initial assessments
- Counseling
- Facilitating access to mainstream services
- Monitoring and evaluating program participant progress
- Coordination with and referrals to other providers
- Developing individualized housing and service plans

Under the rapid re-housing component, these funds can be used for case management services alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, services (such as case management) could be provided after the term of a program participant's rental assistance expires, as long as the 12-month cap for each type of assistance is not exceeded.

“Stand alone” case management or other services can also be provided to support program participants who receive rental assistance through another resource, as long as the individual or family is eligible for assistance at the time of the intake evaluation.

Housing Search and Placement

Housing search funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable housing. Component services or activities may include: tenant counseling, assisting individuals and families to understand leases, securing utilities; making moving arrangements, representative payee services concerning rent and utilities, and mediation and outreach to property owners related to locating or retaining housing. Costs also include expenditures associated with assessing housing unit compliance with property standards, lead requirements, and rent reasonableness. Costs associated with staff in the role of housing locator are eligible housing search and placement costs.

Administrative Costs

Administrative costs for rapid re-housing programs are limited to no more than three percent of the total grant amount. These costs include allowable organizational costs (e.g., audit) and costs associated with the service provision location such as rent, utilities, insurance.

Permanent Supportive Housing

Homeless Reduction Grant funds may be used for housing stabilization assistance for formerly chronically homeless individuals/families in permanent supportive housing. Housing stabilization services are the only eligible cost type within this activity. Services must be designed and implemented to ensure program participants remain independently housed.

Housing Stabilization Services

These are the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for program participants residing in permanent housing. Clients must receive case management at least once a month.

These costs include:

- Conducting initial assessments
- Counseling
- Facilitating access to mainstream services
- Monitoring and evaluating program participant progress
- Coordination with and referrals to other providers
- Developing individualized housing and service plans

Predevelopment

The Homeless Reduction Grant will provide predevelopment grants for permanent supportive housing projects intended to serve chronically homeless individuals. Selected projects will always be assisted with the minimum amount of assistance needed. Note that applications for Homeless Reduction Grant predevelopment assistance will receive bonus points if the predevelopment assistance is for a project that either has a funding commitment through DHCD or has applied for DHCD project funding.

A project must be a rental project with at least a portion of the units targeted to provide permanent supporting housing (former chronically homeless).

All assisted projects should be located, where possible, in areas that decrease the overall concentration of poverty and minorities and provide safe environments and access to community services.

Eligible predevelopment costs include:

- Feasibility study fees
- Consulting fees
- Financial application costs
- Architects, legal, engineers, development team fees
- Site control expenses
- Title clearance costs

Requirements

These requirements apply to the Homeless Reduction Grant program funded grantees in the emergency crisis response system.

Confidentiality Policy

All grantees shall agree to ensure the confidentiality of the name of any individual assisted and any other information regarding individuals receiving assistance.

The grantee's confidentiality policy should, at a minimum, address:

- How staff will gather, record, and store confidential information.
- The consent process for the release of confidential information.
- Protocols for responding to breaches of confidentiality.
- Privacy standards related to data collection and use of participant information for program reporting, such as HMIS.

Grievance and Termination Policy

Any individual receiving assistance must receive written notification of the grantee's grievance policy. Grievance policies must be board approved and provide specific procedures to be followed for any disputed decision impacting this assistance. Program participants contacting DHCD directly will be referred back to the grantee's grievance policy. The grantee must be prepared to provide documentation of the grievance record for all program participant grievances. DHCD reserves the right to review and approve all program grievance policies.

The grantee may terminate assistance to a program participant who violates program requirements. Grantees may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the grantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of: (1) Written notice to the program participant containing a clear statement of the reasons for termination; (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and, (3) Prompt written notice of the final decision to the program participant.

Recordkeeping

Grantees must keep any records and make any reports (including those pertaining to services received, program participant housing status, race, ethnicity, gender, and disability status data) that DHCD may require within the specified timeframe. All program and program participant records must be maintained for at a minimum of five years. Note that records include both program records such as the documentation or match requirement, financial records such as bank statements, and program participant records. Copies of cancelled checks or expenses associated with the program participant must also be retained. For more information about documentation requirements see [Accounting Standards](#).

Grantees are required to maintain a record of all clients that are screened and classified as ineligible. This must include documentation of the reason for the determination of ineligibility.

Method of Payment

Grantees will submit request for remittances through CAMS. All grantees must be registered in CAMS. Grantees must have approved audits in CAMS in order to receive reimbursements. Any grantee with unresolved findings or compliance issues may have reimbursement suspended.

DHCD requires that grantees receive funds via electronic transfer. To establish an account go to the [Virginia Department of Accounts](#) website and select Electronic Data Interchange (EDI) from the links on the right hand side of the page. The EDI guide then may be accessed through a link under the Trading Partner Information section.

Financial Management

Grantees must ensure compliance with regulations and requirements pertaining to the following key areas of financial management:

- Allowable costs
- Source documentation
- Internal controls
- Budget controls
- Cash management
- Cost allocation plans
- Accounting records
- Procurement
- Property asset controls
- Audits

Grantees must use funds only for eligible activities and in accordance with the DHCD-approved program budget. Any changes from the planned expenditures must be approved in advance by DHCD. The funds may not be used for activities other than those authorized in the guidelines and approved by DHCD. Furthermore, all expenditures must be in accordance with conditions such as funding ceilings and other limitations on eligible costs.

Internal controls refer to the combination of policies, procedures, defined responsibilities, personnel and records that allow an organization to maintain adequate oversight and control of its finances. As such, internal controls reflect the overall financial management system of an organization or agency. Budget controls, cash management, cost allocation plans, accounting records, procurement and property controls are subsets of the overall financial system. Grantees will be monitored for required documentation and compliance with the program requirements.

A financial compliance monitoring may review the following:

- An organizational chart showing titles and lines of authority for all individuals involved in approving or recording financial (and other) transactions
- Written position descriptions that describe the responsibilities of all key employees

- A written policy manual specifying approval authority for financial transactions and guidelines for controlling expenditures
- Written procedures for the recording of transactions, as well as an accounting manual and a chart of accounts
- Adequate separation of duties to ensure that no one individual has authority over an entire financial transaction
- Hiring policies to ensure that staff qualifications are equal to job responsibilities and that individuals hired are competent to do the job
- Access to accounting records, assets, blank forms and confidential records is adequately controlled, such that only authorized persons can access them
- Procedures for regular reconciliation of its financial records, comparing its records with actual assets and liabilities of the organization
- Accounting records/source documentation
- Cash management procedures
- Cost allocation plans
- Procurement procedures
- Property controls
- Annual Audit

Time Sheets

Employee time sheets should reflect actual hours (not percentages) work and be based on the cost allocation plan. Time sheets should be signed and dated by the employee and the supervisor with first-hand knowledge of the work performed or equivalent electronic approval. If the expenditures are paid for by more than one source (e.g., federal, United Way, private donations) the split costs should be accurately tracked within the grantee's accounting system.

Accounting Standards

In addition to establishing a system of accounting sufficient to accurately record and report transactions, adequate source documentation *must* be maintained as support for these transactions. Source documents includes but is not limited to the following:

- Purchase Requisitions
- Purchase Orders
- Contracts
- Contract Invoices
- Bank Statements
- Cancelled Checks
- Draw downs
- Payment Vouchers
- Employee Time Sheets
- Travel Advance Requests
- Travel Reimbursement Vouchers
- Vendor Invoices
- Journal Voucher Entries
- Cash Receipts

All source documents must be coded by a reference number so that a clear link exists between the fiscal records and these documents. Coding could include the check number used to make the payment, the journal entry in which transaction was recorded or the page number from the cash receipt journal. Purchase order numbers and payment voucher numbers may also be used to provide the necessary audit link.

Supporting documents can be copies or originals, but must be sufficient in detail to support the transaction and to justify it as an allowable grant expense.

The grantee *must* keep copies of the source documents and be made available for DHCD review upon request.

The grantee must maintain proof of cancellation (e.g. copy of check's backside, bank statement, or photocopy of check's cancellation) for all payments. Note that while these are not required in the program participant files that they must be readily available for monitoring purposes.

Internal Controls

The grantee must have appropriate internal controls in place to:

- Safeguard assets
- Prevent waste, fraud, and mismanagement
- Promote efficiency of operations

Effective Internal Controls to the extent possible must include the following procedures:

- Segregation of duties among employees to prevent one person from having complete control over all phases of any transaction.
- Workflow procedures for processing all transactions from one employee to another. This *must* provide for a cross-check of work, but not a duplication of effort.
- Rotation of duties among employees to allow for control over any one given phase and ensure that other employees can fill in when a position becomes vacant.
- The procedures used should be clearly detailed and documented for all individuals to follow and as an aid in training new employees.
- All assets, records, and checks *must* be properly protected through the use of locks, safes, and other measures to ensure security.

Monitoring

DHCD is responsible for monitoring all program activities carried out by a grantee to ensure that the program requirements are met. Monitoring can include both programmatic and financial reviews. Grantees must make available organizational and project related records to DHCD with notice.

Grantees are responsible for all programmatic and contractual terms. The grantee is responsible for ensuring that these terms and requirements are met regardless of partnership arrangements or M.O.U.s with other organizations.

Organizational Conflicts of Interest

The provision of any type or amount of assistance may not be conditional on an individual's or family's acceptance or occupancy of housing owned by the grantee, the sub-grantee, a parent organization, or subsidiary. Grantees/sub-grantees, parent organizations, or subsidiaries may not administer rapid re-housing or prevention assistance and use the assistance for households residing in units owned by the grantee/sub-grantee, parent organization, or subsidiary. An organization may not both participate in decision-making related to determining eligibility and receive any financial benefit.

A waiver may be requested for an organization to both administer rapid re-housing assistance and place households in units owned by the same organization, a parent organization, or subsidiary where critical local necessity can be demonstrated and where program participant evaluations will be provided by another unrelated organization. Waiver requests must be submitted in writing to DHCD prior to the provision of rapid re-housing assistance specific to the requested waiver.

Individual Conflicts of Interest

Individual conflicts of interest apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee or its sub-grantee.

For the procurement of goods and services, the grantee and/or its sub-grantee must comply with the agency code of conduct and conflict of interest policies.

Individuals (employees, agents, consultants, officers, or elected or appointed officials of the grantee or sub-grantee) may not both participate in decision-making related to determining eligibility and receive any financial benefit. This financial benefit may not be received by the specific individual, any member of his/her immediate family or a business interest. The restriction applies throughout tenure in the position and for a one-year period following tenure.

Upon the written request of the grantee, DHCD may grant an exception to the restrictions in the paragraph above on a case-by-case basis when it determines that the exception will serve to further the purposes of the program and promote the efficient use of program funds. In requesting an exception, the grantee must provide a disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made.

Property Standards

DHCD provides a Habitability Standards form that must be completed, signed by all required parties, and included in all program participant records for rapid re-housing assistance. While the habitability standards do not require a certified inspector, the inspector must meet one of the following criteria:

- Homeless Reduction Grant program staff; or
- Staff from or hired by an agency of the grantee/sub-grantee, such as a city department that is designated to conduct inspections, or a contractor hired for that task; or
- Staff from another subsidy program that is providing assistance and also requires an inspection (e.g., Section 8, Public Housing).

Note that the habitability standards are different from HUD's Housing Quality Standards (HQS).

Housing that is occupied by families with children and that was constructed before 1978 must also comply with Lead Based Paint inspection requirements, per the Lead Based Paint Poisoning Prevention Act. This requirement applies only to units that a family moves into with assistance.

DHCD provides a Lead-Based Paint Visual Assessment form that must be completed and included in program participant records. Staff must complete an online training course before performing [visual assessments](#).

Nondiscrimination and Equal Opportunity Requirements

Grantees must comply with all applicable fair housing and civil rights requirements. In addition, grantees must make known that rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about and equal access to the financial assistance and services provided under this program.

Among other things, this means that each grantee must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may include providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to this assistance.

Affirmatively Furthering Fair Housing

Grantees will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. In addition, Virginia's Fair Housing Law further protects "elderliness," individuals age 55 or older, from housing discrimination. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800-669-9777; and (5) recruiting landlords and service providers in areas to which housing choice is expanded. In addition, housing discrimination complaints may be reported to the Virginia Fair Housing Office at the Department of Professional and Occupational Regulation (DPOR) at (888) 551-3247.